

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

PETER M. GALLIGAN,	§	
	§	
PLAINTIFF	§	
	§	
v.	§	CIVIL CASE NO. 1:17-cv-06310
	§	
ADTALEM GLOBAL EDUCATION INC. F/K/A	§	
DEVRY EDUCATION GROUP; ADTALEM	§	
GLOBAL HEALTH, INC. F/K/A DEVRY	§	
MEDICAL INTERNATIONAL, INC.; ROSS	§	
UNIVERSITY SCHOOL OF MEDICINE	§	
SCHOOL OF VETERINARY MEDICINE (ST.	§	
KITTS) LIMITED; AND DOES 1 THROUGH	§	
50,	§	
	§	
DEFENDANTS	§	JURY TRIAL DEMANDED
	§	

**PLAINTIFF'S MOTION FOR LEAVE
TO EXCEED THE PAGE LIMIT FOR THE RESPONSE TO DEFENDANTS'
MOTION TO DISMISS THE SECOND AMENDED COMPLAINT**

Plaintiff Peter M. Galligan ("Plaintiff") files this Motion for Leave to Exceed the Page Limit for the Response to Defendants' Motion to Dismiss the Second Amended Complaint, pursuant to Local Rule 7.1, because the nature of Defendants' motion to dismiss and the number of claims at issue require briefing in excess of 15 pages. Currently, the deadline for Plaintiff to file a response to the motion to dismiss is Friday, May 4, 2018.

Defendants' Motion to Dismiss the Second Amended Complaint [Dkts. 33-35] seeks the dismissal of all of Plaintiff's claims in this proceeding. Plaintiff's claims center on the failure by Defendants Adtalem Global Education Inc. f/k/a DeVry Education Group, Adtalem Global Health, Inc. f/k/a DeVry Medical International, Inc., and Ross University School of Medicine School of Veterinary Medicine (St. Kitts) Limited

(collectively, “Defendants”)¹ to appropriately accommodate his documented learning disabilities, which Plaintiff alleges constituted violations of federal, state, and common law as well as Defendant’s own published policies and guidelines. To adequately respond to Defendants’ arguments, Plaintiff must demonstrate the validity of the legal bases for the nine claims at issue. Accordingly, Plaintiff respectfully requests leave to file a brief exceeding the 15-page limitation prescribed by this Court’s local rules, but in all events totaling 30 pages or less. Plaintiff does not make this request to burden the Court, but so that justice may be done.

¹ Plaintiff’s claims in this lawsuit are also asserted against Does 1 through 50, as defendants. However, for purposes of this motion, references to “Defendants” shall only include Adtalem Global Education Inc. f/k/a DeVry Education Group, Adtalem Global Health, Inc. f/k/a DeVry Medical International, Inc., and Ross University School of Medicine School of Veterinary Medicine (St. Kitts) Limited, all of whom are represented by the counsel listed in the Certificate of Service.

Dated this 30th day of April, 2018.

Respectfully submitted,

/s/ Michael W. Ford

Michael W. Ford, Esq.
Law Offices of Michael W. Ford
(*local counsel*)
4 Timberwood Lane
Riverwoods, IL 60015
Telephone: (847) 948-7884
Email: mfordski@aol.com
IL Bar # 0846139
Member, Trial Bar U.S. District Court N.D. IL

- and -

/s/ Emil T. Bayko

Emil T. Bayko
PORTER HEDGES LLP
1000 Main Street, 36th Floor
Houston, Texas 77002
Telephone: (713) 226-6608
Facsimile: (713) 226-6208
Email: tbayko@porterhedges.com
IL Bar # 0141356

ATTORNEYS FOR PLAINTIFF
PETER M. GALLIGAN

OF COUNSEL:

Kyle Reeb
Texas State Bar No. 24091604
Federal ID No. 2571829
Jim Aycock
Texas State Bar No. 24034309
Federal ID No. 20675
Alison P. Henderson
Texas State Bar No. 24087707
Federal ID No. 2228628
PORTER HEDGES LLP
1000 Main Street, 36th Floor
Houston, Texas 77002
Telephone: (713) 226-6000
Facsimile: (713) 226-6211
kreeb@porterhedges.com
jaycock@porterhedges.com
ahenderson@porterhedges.com

CERTIFICATE OF CONFERENCE

I hereby certify that on April 27, 2018, my associate—Alison P. Henderson—emailed Defendants’ counsel regarding the requested relief and attached a draft of Plaintiff’s motion for leave. As of the date of filing of this motion, Defendants’ counsel has not responded indicating whether they are opposed or unopposed to the relief sought herein. In the event Defendants’ counsel responds to the email with their position regarding this motion and does not otherwise file a notice regarding their position, we will promptly advise the Court.

/s/ Emil T. Bayko
Emil T. Bayko

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2018, a true and correct copy of the foregoing pleading was electronically filed in accordance with the Federal Rules of Civil Procedure and was served via e-mail upon the following counsel of record:

Brian Stolzenbach
Megan Troy
SEYFARTH SHAW LLP
233 S. Wacker Drive, Suite 8000
Chicago, IL 60606-6448
(312) 460-5551
bstolzenbach@seyfarth.com
mtroy@seyfarth.com

/s/ Emil T. Bayko
Emil T. Bayko